REMARKS/ARGUMENTS

Upon entry of the above amendment, claims 7, 9, 11, and 12 will have been amended for consideration by the Examiner.

In view of the above, Applicants respectfully request reconsideration of the outstanding rejections of all the claims pending in the present application. Such action is respectfully requested and is believed to be appropriate and proper.

Initially, Applicants would like to express their appreciation to the Examiner for the detailed Official Action provided.

Turning to the merits of the action, the Examiner has rejected claims 7, 9, 11 and 12 under 35 U.S.C. § 112, first paragraph, as failing to comply with the written description requirement. The Examiner states in the outstanding Official Action mailed on December 19, 2005 that "as per claims 7, 9, 11 and 12, the newly added limitations of 'without intervention of the recipient' is a negative limitation used to overcome the rejections and therefore fails to comply with the written description requirement". By the present amendments, Applicants have amended claims 7, 9, 11 and 12 to clarify the scope of the invention. Thus, Applicants respectfully request that the Examiner withdraw the rejection. In this regard, Applicants submit that the limitation of "without receiving from the recipient an instruction for the transmission of the HTML data the recipient" has basis in the original disclosure. As shown in the sequence chart of Fig.5, ADPT100A converts the received e-mail data into HTML data (paragraph [0042]) and transmit to the recipient (ADPT100B), via the first communicator, the HTML data (paragraph [0054], ST607 in Fig. 6) without receiving from the recipient (ADPT100B) an instruction for the transmission of the HTML data to the recipient (ADPT100B), based

on the URL data according to a HTTP protocol. ADPT100A conducts a procedure for establishing a connection between ADPT100A and ADPT100B (paragraphs [0042]-[0048]), but does not receive from the recipient (ADPT100B) an instruction for the transmission of the HTML data to the recipient (ADPT100B).

Similarly, Applicants submit that the limitation of "without receiving, from a user of the receiving Internet facsimile apparatus, an instruction for the transmission of the e-mail data to the receiving Internet facsimile apparatus" has basis in the original disclosure. As shown in the sequence of Fig. 5, ADPT 100B convert the received HTML data into e-mail data (paragraph [0074]) and transmits to the receiving Internet facsimile apparatus 101B, via the second communicator, the e-mail data (paragraph [0067], ST614) without receiving, from a user of the receiving Internet facsimile apparatus 101B, an instruction for the transmission of the e-mail data to the receiving Internet facsimile apparatus 101B, based on the e-mail address according to a SMTP protocol. ADPT100B conducts a pre-procedure for a transmission of e-mail data to IFAX 101B (paragraphs [0063] and [0064]), but does not receive, from a user of the receiving Internet facsimile apparatus, an instruction for the transmission of the e-mail data to the receiving Internet facsimile apparatus.

Therefore, Applicants respectfully submit that support for the features recited in the claims are supported by the specification, and respectfully request that the Examiner withdraw this ground of rejection.

The Examiner has rejected claims 7, 8, and 11 under 35 U.S.C § 103(a) as being unpatentable over CHEN (U.S. Patent No. 6,836,792) in view of TOYODA (U.S. Patent No. 5,881,233), BEER et al. (U.S. Patent No. 5,864,676) and HIGLEY (U.S.

Patent No. 6,065,048). The Examiner has rejected claims 9, 10, and 12 under 35 U.S.C § 103(a) as being unpatentable over BRITTON (U.S. Patent Publication No. 2002/0177757) in view of TOYODA and BEER et al.

As noted above, Applicants have amended claims 7, 9, 11, and 12 for the Examiner's consideration. Applicants respectfully traverse the above rejections based on pending claims 7-12, and will discuss the rejections with respect to the pending claims in the present application, as will be set forth hereinbelow. The amended claims clarify the subject matter recited in the rejected claims, but do not narrow the scope of the claims.

Applicants' invention, as defined by the claims, relates to a communication control apparatus which comprises a first communicator configured to be connected to a network, and a second communicator configured to be connected to an Internet facsimile apparatus. The first communicator comprises a component of the communication control apparatus, and the second communicator comprises a component of the communication control apparatus. The Internet facsimile apparatus scans image data and transmits to a recipient, via the communication control apparatus, an e-mail to which the scanned image data is attached. The communication control apparatus further comprises a controller which receives from the Internet facsimile apparatus, via the second communicator, an e-mail address of the recipient according to a SMTP protocol, converts the received e-mail address of the recipient into URL data, receives, from the receiving Internet facsimile apparatus via the second communicator, e-mail data directed to the recipient according to the SMTP protocol, converts the e-mail data into HTML data, and transmits to the recipient, via the

first communicator, the HTML data without receiving, from the recipient, an instruction for the transmission of the HTML data to the recipient, based on the URL data according to a HTTP protocol. Claims 11-12 recite related methods.

With respect to the rejection of claims 7, 8, and 11 under 35 U.S.C. § 103(a), Applicants submit that CHEN relates to a method for providing add-on services responsive to an e-mail transferred via a distributed computer network. In CHEN, e-mail sender 102 commands e-mail front end 108 to transmit an e-mail to e-mail recipient 106, using a send command (col. 1, lines 56-58). The transmitted e-mail is received at e-mail system 130 by an SMTP server 140 (col. 2, lines 11-12). An HTML converter facility 158 included in the e-mail system 130 converts the e-mail message to an appropriate format (col. 2, lines 30-36). E-mail recipient 106 sends a command to the e-mail system 130 via e-mail front end 150 to request the e-mail message from the e-mail system 130 (col. 2, lines 22-30).

Applicants submit (and the Examiner acknowledged in the Official Action mailed on July 25, 2005) that CHEN does not disclose a controller which converts the e-mail address of the recipient into URL data. For this reason, Applicants submit that CHEN fails to disclose a controller that transmits HTML data to the recipient, based on URL data, as taught by the present invention.

Rather, as noted above, in CHEN, e-mail recipient 106 sends a command to e-mail system 130 to retrieve the e-mail message from e-mail system 130 (col. 2, lines 22-30). In other words, e-mail recipient 106 of CHEN utilizes a command to request the e-mail message from the e-mail system 130, but the HTML converter facility 158 does not utilize URL data to transmit the e-mail message to the e-mail recipient 106.

first communicator, the HTML data without receiving, from the recipient, an instruction for the transmission of the HTML data to the recipient, based on the URL data according to a HTTP protocol. Claims 11-12 recite related methods.

With respect to the rejection of claims 7, 8, and 11 under 35 U.S.C. § 103(a), Applicants submit that CHEN relates to a method for providing add-on services responsive to an e-mail transferred via a distributed computer network. In CHEN, e-mail sender 102 commands e-mail front end 108 to transmit an e-mail to e-mail recipient 106, using a send command (col. 1, lines 56-58). The transmitted e-mail is received at e-mail system 130 by an SMTP server 140 (col. 2, lines 11-12). An HTML converter facility 158 included in the e-mail system 130 converts the e-mail message to an appropriate format (col. 2, lines 30-36). E-mail recipient 106 sends a command to the e-mail system 130 via e-mail front end 150 to request the e-mail message from the e-mail system 130 (col. 2, lines 22-30).

Applicants submit (and the Examiner acknowledged in the Official Action mailed on July 25, 2005) that CHEN does not disclose a controller which converts the e-mail address of the recipient into URL data. For this reason, Applicants submit that CHEN fails to disclose a controller that transmits HTML data to the recipient, based on URL data, as taught by the present invention.

Rather, as noted above, in CHEN, e-mail recipient 106 sends a command to e-mail system 130 to retrieve the e-mail message from e-mail system 130 (col. 2, lines 22-30). In other words, e-mail recipient 106 of CHEN utilizes a command to request the e-mail message from the e-mail system 130, but the HTML converter facility 158 does not utilize URL data to transmit the e-mail message to the e-mail recipient 106.

Therefore, Applicants submit that there is no suggestion about transmitting, to the recipient via the first communicator, HTML data without receiving, from the recipient, an instruction for the transmission of the HTML data to the recipient, based on URL data, in CHEN.

Thus, Applicants submit that claims 7, 8, and 11 are clearly distinct from CHEN.

Applicants additionally submit that TOYODA fails to disclose that which is lacking in CHEN. TOYODA relates to an Internet facsimile apparatus. However, Applicants submit that TOYODA merely discloses the Internet facsimile apparatus itself. That is, TOYODA does not disclose at least a communication control apparatus which includes at least 1) a controller that converts the e-mail address of the recipient into URL data, and 2) a controller that transmits to the recipient, via the first communicator, HTML data without receiving, from the recipient, an instruction for the transmission of the HTML data to the recipient, based on URL data according to a HTTP protocol.

Thus, Applicants submit that even if one attempted to combine the teachings of CHEN and TOYODA in the manner suggested by the Examiner, one would fail to arrive at the instant invention, as defined by pending claims 7, 8, and 11, as such a combination would fail to at least provide 1) a controller that converts the e-mail address of the recipient into URL data, and 2) a controller that transmits to the recipient, via the first communicator, HTML data without receiving, from the recipient, an instruction for the transmission of the HTML data to the recipient, based on URL data according to a HTTP protocol.

Further, Applicants submit that BEER et al. fail to disclose that which is lacking in CHEN and TOYODA. BEER et al. relates to a URL login system for fetching objects

from various locations on a network, using a URL instead of a specific home directory. BEER et al. discloses a simple translation rule to compute a URL from an e-mail address (col. 4, lines 5-30).

However, Applicants submit that BEER et al. does not contain (or suggest) any disclosure with respect to an Internet facsimile apparatus.

Applicants further submit that BEER et al. also does not disclose (or suggest) a controller which receives, from the Internet facsimile apparatus via the second communicator, an e-mail address of the recipient according to a SMTP protocol, since BEER et al. does not contain any disclosure with respect to a communication control apparatus connected to an Internet facsimile apparatus. Rather, in BEER et al., a user enters, by hand, an e-mail address into a Login Manager 3, which runs on a user system 5. The Login Manager 3 determines a URL corresponding to the e-mail (col. 3, lines 66-67 and col. 4, lines 1-2). On the other hand, the communication control apparatus of Applicants' present invention is distinct from an Internet facsimile apparatus.

Further, BEER et al. does not disclose a controller which receives, from the receiving Internet facsimile apparatus via the second communicator, e-mail data directed to the recipient according to the SMTP protocol, converts the received e-mail data into HTML data, and transmits, to the recipient via the first communicator, HTML data, based on URL data according to a HTTP protocol, since BEER et al. does not contain any disclosure with respect to Applicants' claimed controller. Rather, in BEER et al., a user system 5 fetches, for example from server A, a login object referred by URL (col. 4, lines 41-49 and Fig. 2 STEP 104). In other words, in BEER et al., a user

at the receiving side must take an affirmative action. On the other hand, a communication control apparatus of the present invention transmits to the recipient, via the first communicator, HTML data without receiving, from the recipient, an instruction for the transmission of the HTML data to the recipient, based on URL data.

Thus, Applicants submit that even if one attempted to combine the teachings of CHEN, TOYODA and BEER et al. in the manner suggested by the Examiner, one would fail to arrive at the instant invention, as defined by amended claims 7, 8, and 11, as such a combination would fail to at least provide a controller that transmits to the recipient, via the first communicator, HTML data without receiving, from the recipient, an instruction for the transmission of the HTML data to the recipient, based on URL data according to a HTTP protocol.

Further, Applicants submit that HIGLEY fail to disclose that which is lacking in CHEN, TOYODA and BEER. HIGLEY relates to a method and system for sending and receiving URLs in electronic mail over the Internet. When the message type indicates a URL, the URL is looked up so that the information corresponding to the URL is displayed (see Fig. 4, step 420). When the received document is of the HTML type, the document is displayed and a user may click on the URL to look up the information corresponding to the URL (Fig. 4, steps 430-432). When the received document is of the text type, the text may be converted to the HTML format and the HTML format document is displayed so that a user may click on the URL to look up the information corresponding to the URL (Fig. 4, steps 440, 442 and 444).

However, as admitted by the Examiner in the outstanding Official Action, HIGLEY does not disclose (or suggest) a communication control apparatus that

transmit to the recipient, via the first communicator, the HTML data without receiving from the recipient an instruction for the transmission of the HTML data to the recipient, based on the URL data according to a HTTP protocol. Rather, HIGLEY merely displays the converted HTML format document (Fig. 4, steps 440, 442, and 444), but does not transmit to the recipient, via the first communicator, the HTML data without receiving from the recipient an instruction for the transmission of the HTML data to the recipient, based on the URL data according to a HTTP protocol. Applicants submit that, in HIGLEY, the received and converted HTML format document is not supposed to be transmitted to a recipient, since HIGELEY does not disclose or suggest transferring the received and converted HTML format document to another recipient (Fig. 3).

In applying HIGLEY, the Examiner asserts that one of ordinary skill knows that e-mail is sent without user intervention. Applicants submit that such assertion is incorrect. In particular, Applicants submit that a user must take an affirmative action to load an e-mail program and request the checking for e-mail. Only thereafter will the e-mail program periodically check for further e-mail. However, the initial e-mail check requires an affirmative action by a user.

Thus, Applicants submit that even if one attempted to combine the teachings of CHEN, TOYODA, BEER et al. and HIGLEY in the manner suggested by the Examiner, one would fail to arrive at the instant invention, as defined by amended claims 7, 8, and 11, as such a combination would fail to at least provide a controller that transmits to the recipient, via the first communicator, HTML data without receiving, from the recipient, an instruction for the transmission of the HTML data to the recipient, based on URL data according to a HTTP protocol.

Therefore, Applicants submit that the amended claims are not obvious in view of the applied art of record, and respectfully requests withdrawal of the 35 U.S.C. § 103 rejection of claims 7, 8 and 11, and an indication of the allowability of claims 7, 8, and 11. Claims 7, 8, and 11 are also submitted to be patentable over the Examiner's proposed combination, since the combination of CHEN, TOYODA, BEER et al., and HIGLEY does not disclose the combination of the features recited in Applicants' claims 7, 8, and 11.

Moreover, Applicants submit that the Examiner has not set forth a proper motivation for modifying CHEN and BEER et al. so as to transmit to the recipient HTML data without receiving, from the recipient, an instruction for the transmission of the HTML data to the recipient, based on URL data. In CHEN, e-mail recipient 106 accesses the e-mail message by sending a command to the e-mail system 130 and requests the e-mail message from e-mail system 130 (col. 2, lines 21-30). In other words, in CHEN, e-mail recipient 106 at the receiving side sends a command to receive the e-mail message from the e-mail system 130. Similarly, In BEER et al., the user system 5 at the receiving side attempts to fetch login objects from a server takes action. Further, BEER et al. merely discloses a simple translation rule to compute a URL from an e-mail address.

With respect to the rejection of claims 9, 10, and 12 under 35 U.S.C. § 103(a), Applicants submit that BRITTON relates to a method and apparatus for facilitating an exchange of information associated with a patient's medical care.

However, as the Examiner admitted in the outstanding Official Action mailed on December 19, 2005, BRITTON does not disclose at least 1) receiving from the

transmitter via the first communicator URL data according to a HTTP protocol and 2) converting the received URL data into an e-mail address of the receiving Internet facsimile apparatus.

Applicants additionally submit that TOYODA fails to disclose that which is lacking in BRITTON. TOYODA relates to an Internet facsimile apparatus. However, Applicants submit that TOYODA merely discloses the Internet facsimile apparatus itself. That is, TOYODA does not disclose a communication control apparatus which includes at least 1) a controller that receives, from the transmitter via the first communicator, URL data according to a HTTP protocol, and 2) a controller that converts the received URL data into an e-mail address of the receiving Internet facsimile apparatus.

Thus, Applicants submit that even if one attempted to combine the teachings of BRITTON and TOYODA in the manner suggested by the Examiner, one would fail to arrive at the instant invention, as defined by pending claims 9, 10, and 12, as such a combination would fail to provide a communication control apparatus which includes at least 1) a controller which receives, from the transmitter via the first communicator, URL data according to a HTTP protocol, and 2) a controller which converts the received URL data into an e-mail address of the receiving Internet facsimile apparatus.

Further, Applicants submit that BEER et al. fails to disclose that which is lacking in BRITTON and TOYODA. Applicants submit that BEER et al. does not disclose a second communicator which is connected to a receiving Internet facsimile apparatus, since BEER et al. does not contain any disclosure with respect to an Internet facsimile apparatus.

Further, Applicants submit that BEER et al. do not disclose a controller which receives, from the transmitter via the first communicator, URL data according to a HTTP protocol. Rather, Applicants submit that BEER et al. discloses that a user enters, by hand, an e-mail address into a Login Manager 3, which runs on a user system 5, and the Login Manager 3 determines a URL corresponding to the e-mail (col. 3, lines 66-67 and col. 4, lines 1-2).

Still further, Applicants submit that BEER et al. does not disclose a controller which converts HTML data into an e-mail address of the receiving Internet facsimile apparatus. Rather, it is submitted that BEER et al. merely teach computing a URL from an e-mail address (col. 4, lines 5-9).

Thus, Applicants submit that even if one attempted to combine the teachings of BRITTON, TOYODA and BEER et al. in the manner suggested by the Examiner, one would fail to arrive at the instant invention, as defined by amended claims 9, 10 and 12, as such a combination would fail to provide a communication control apparatus which includes at least 1) a controller which receives, from the transmitter via the first communicator, URL data according to a HTTP protocol, and 2) a controller which converts the received URL data into an e-mail address of the receiving Internet facsimile apparatus.

Therefore, Applicants submit that the amended claims are not obvious in view of the applied art of record, and respectfully request withdrawal of the 35 U.S.C. § 103 rejection, along with an indication of allowability of claims 9, 10, and 12. Pending claims 9, 10, and 12 are also submitted to be patentable over the Examiner's proposed

combination, since the combination of BRITTON, TOYODA, and BEER et al. fail to disclose the combination of the features recited in Applicant's claims 9, 10, and 12.

Moreover, Applicants submit that the Examiner has not set forth a proper motivation for combining BRITTON and BEER et al. so as to receive, from the transmitter via the first communicator, URL data according to a HTTP protocol, and to convert the received URL data into an e-mail address of the receiving Internet facsimile apparatus. Applicants submit that BRITTON does not disclose or suggest receiving, from the transmitter via the first communicator, URL data according to a HTTP protocol, and converting the received URL data into an e-mail address of the receiving Internet facsimile apparatus. Similarly, Applicants submit that BEER et al. merely discloses a simple translation rule to compute a URL from an e-mail address.

Accordingly, Applicants respectfully request reconsideration and withdrawal of the outstanding objection and rejections, and an indication of the allowability of all the claims pending in the present application in due course.

SUMMARY AND CONCLUSION

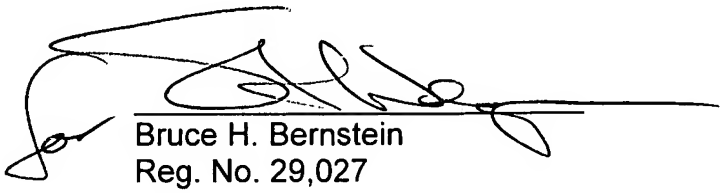
Applicants have made a sincere effort to place the present application in condition for allowance and believe that they has now done so. Applicants have amended the rejected claims for consideration by the Examiner. With respect to the pending claims, Applicants have pointed out the features thereof and have contrasted the features of the new claims with the disclosures of the references. Accordingly, Applicants have provided a clear evidentiary basis supporting the patentability of all claims in the present application and respectfully requests an indication of the allowability of all the claims pending in the present application in due course.

Should an extension of time be necessary to maintain the pendency of this application, including any extensions of time required to place the application in condition for allowance by an Examiner's Amendment, the Commissioner is hereby authorized to charge any additional fee to Deposit Account No. 19-0089.

The amendments to the claims which have been made in this amendment, and which have not been specifically noted to overcome a rejection based upon the prior art, should be considered to have been made for a purpose unrelated to patentability, and no estoppel should be deemed to attach thereto.

Should the Examiner have any questions or comments regarding this Response, or the present application, the Examiner is invited to contact the undersigned at the below-listed telephone number.

Respectfully submitted,
Akimoto MASAO et al.



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